

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DORMAN ANGEL , et al.,
Plaintiffs

v.

INTERNATIONAL PAPER COMPANY, et al.,
Defendants.

Civil Action No. C-1-01-467
JUDGE: BECKWITH

DISMISSAL OF AGE AND DISABILITY CLAIMS
AGAINST INTERNATIONAL PAPER

IT IS HEREBY STIPULATED, pursuant to Rule 41(a)(1)(ii), by the undersigned attorney of record for Plaintiffs and by all parties who have appeared in this action that all claims of age and disability discrimination against International Paper, including but not limited to Counts VI and IX of Plaintiffs' Second Amended Complaint, in the above-entitled action be, and the same hereby is, dismissed with prejudice, each party to bear its own costs and attorneys fees.

Respectfully submitted,

By /s/ Mark J. Byrne
Counsel

Mark J. Byrne, Esq.
JACOBS, KLEINMAN, SEIBEL &
MCNALLY
2200 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

ATTORNEY FOR PLAINTIFFS

By /s/ Vincent Miraglia

Vincent Miraglia,
International Paper
6400 Poplar Avenue
Memphis, TN 38197

Grant S. Cowan
Frost Brown Todd LLC
2200 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

ATTORNEYS FOR DEFENDANT
INTERNATIONAL PAPER

By /s/ James B. Robinson

James B. Robinson
2500 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

ATTORNEY FOR DEFENDANT
UNITED PAPERWORKERS
INTERNATIONAL UNION

By /s/ Roger I. Doggett

Robert I. Doggett
215 East Ninth Street, Sixth Floor
Cincinnati, Ohio 45202

ATTORNEY FOR PLAINTIFF
PACE LOCAL 1967

By /s/ Stanley F. Lechner

Stanley F. Lechner,
MORGAN, LEWIS & BOCKIUS
1111 Pennsylvania Avenue, NW
Washington, DC 20004

ATTORNEY FOR DEFENDANT
SMART PAPERS

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Grant S. Cowan, Esquire
Frost Brown Todd LLC
Attorney for Defendant
International Paper Company
2200 PNC Center
201 E. Fifth Street
Cincinnati, OH 45202
gcowan@fbtlaw.com

Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197 <mailto:vmiraglia@mcquirewoods.com>
vincent.miraglia@ipaper.com

W. Carter Younger, Esquire
McGuire Woods LLP
Attorney for Defendant
International Paper Company
One James Center
901 E. Cary Street
Richmond, VA 23219
cyounger@mcguirewoods.com

James B. Robinson, Esquire
Kircher, Robinson & Welch
Attorney for Defendant
PACE International Union
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202
kircher@fuse.net

Robert J. Hollingsworth, Esquire
Cors & Bassett
Attorney for Defendant Smart Papers, LLC
537 E. Pete Rose Way, Suite 400
Cincinnati, OH 45202
rjh@corsbassett.com

Stanley F. Lechner, Esquire
Laine S. Posel, Esquire
Morgan, Lewis & Bockius
Attorney for Defendant
Smart Papers, LLC
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
slechner@morganlewis.com
lposel@morganlewis.com

Robert I. Doggett, Esquire
Attorney for Defendant
PACE Local 5-1967
6740 Clough Pike, Room 200
Cincinnati, OH 45244
rdoggett@fuse.net

Charles P. Groppe, Esquire
Morgan, Lewis & Bockius
Attorney for Defendant
Smart Papers LLC
1111 Pennsylvania Avenue, NW
Washington, DC 20004
cgroppe@morganlewis.com

/s/ Mark J. Byrne
MARK J. BYRNE - #0029243
Attorney for Plaintiffs